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Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

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**JUN 20 1994**

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

In the Matter of	)	
	)	
Revision of Part 22 of the	)	CC Docket No. 92-115
Commission's Rules Governing	)	
the Public Mobile Services	)	

**COMMENTS OF GTE**

GTE Service Corporation ("GTE"), on behalf of GTE's affiliated domestic telephone, equipment and service companies, hereby submits its comments in response to the Further Notice of Proposed Rulemaking in the above-captioned docket.<sup>1</sup> GTE is a leading provider of wireless telecommunications service, with offerings including cellular, satellite and other mobile radio services such as Airfone and Railfone. GTE filed comments in response to the earlier Notice of Proposed Rulemaking in this proceeding,<sup>2</sup> and continues to be interested in the changes proposed by the original Notice as well as those now contemplated by the Further Notice.

The Commission has recently noted that the revisions contained in the Further Notice "are proposed in order to make the rules easier to understand, eliminate outdated rules and unnecessary information collection requirements, streamline licensing procedures, and allow licensees greater flexibility in providing service to the public."<sup>3</sup> These comments focus on the proposals concerning cellular service as

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- <sup>1</sup> Revision of Part 22 of the Commission's Rules Governing the Public Mobile Services, CC Docket No. 92-115 (May 20, 1994) [hereinafter "Further Notice"].
  - <sup>2</sup> Revision of Part 22 of the Commission's Rules Governing the Public Mobile Services, 7 FCC Rcd 3658 (1992) [hereinafter "Notice"].
  - <sup>3</sup> FCC Public Notice, Mimeo No. 43471 (June 14, 1994).

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contained in the Further Notice. While GTE supports a substantial portion of the proposals, it believes that some of the Commission's recommendations would be extremely burdensome for licensees and thus should be modified. GTE also suggests other changes that should further achievement of the lofty goals underlying the Commission's proposals in this docket.

## **I. SERVICE AREA BOUNDARY EXTENSIONS**

The Further Notice proposes "to require licensees notifying the Commission of minor modifications to their systems on FCC Form 489, which include SAB [service area boundary] extensions into the adjacent market, to specify whether the 5 year fill-in period for the market has expired and, if so, to state that the SAB extension does not cover any unserved area."<sup>4</sup> GTE supports adoption of the Commission's proposal. Of their own volition, GTE's cellular companies already provide this type of notification with their filings. GTE believes that adoption of this requirement for all licensees will ensure improved coordination between cellular licensees and streamline Commission review of filings.

## **II. MAP SCALE**

The Commission has proposed to change its specifications with respect to the maps required to be filed with many Part 22 filings. Specifically, the Further Notice proposes to change the required scale of the maps from 1:250,000 to 1:500,000.<sup>5</sup> The Further Notice proposal reflects the Commission's belief that this change "would serve the public interest by reducing both filing burdens on applicants as well as review burdens on the staff."<sup>6</sup> GTE is currently using 1:250,000 scale maps and is satisfied

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<sup>4</sup> Further Notice at ¶ 5.

<sup>5</sup> Id. at ¶ 6.

<sup>6</sup> Id.

with their use. At the same time, GTE does not oppose adopting the 1:500,000 scale standard.

GTE wishes to seek clarification of the current language reflected in Section 22.926 of the Commission's Rules, as adopted in the cellular unserved areas proceeding,<sup>7</sup> and certain statements contained in the Further Notice. When the current version of the map rule was adopted, it omitted any reference to "USGS." On that basis, GTE concluded that its maps no longer were required to be plotted on USGS maps. In the Further Notice, however, the Commission once again references USGS maps.<sup>8</sup> GTE believes that the references to "USGS" are meant to indicate one type of map that is readily available, while licensees remain free to use other maps as well. Such maps might include computer generated maps.<sup>9</sup> The Commission should clarify this policy for the industry.

### **III. ELIMINATION OF LICENSING FOR INNER CELL SITES**

The Further Notice proposes "to eliminate the listing of internal cell sites on [FCC] authorizations for existing licensees,"<sup>10</sup> to accommodate the proposal contained in the Notice to permit cellular licensees "to make minor changes to their facilities and to add transmitters within the contours of authorized stations without seeking prior

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<sup>7</sup> See Amendment of Part 22 of the Commission's Rules To Provide for Filing and Processing of Applications for Unserved Areas in the Cellular Service and To Modify Other Cellular Rules, 7 FCC Rcd 2449, 2466 (1992) (Second Report and Order), modified, 8 FCC Rcd 1363 (1993) (Memorandum Opinion and Order on Reconsideration).

<sup>8</sup> Because proposed rules are not included with the Further Notice, the precise language -- and whether it refers specifically to USGS maps -- is not currently known.

<sup>9</sup> GTE, like some other cellular licensees, has the capability to generate maps of its service areas by computer.

<sup>10</sup> Further Notice at ¶ 7.

approval or notifying the Commission of such changes.”<sup>11</sup> The Commission would maintain accurate information regarding the external cell sites constituting a cellular system’s cellular geographic service area (“CGSA”) boundary. The Further Notice further proposes to require the one-time filing by cellular licensees of substantial and detailed information about each external cell site.

GTE has previously supported the elimination of prior notification filings for interior cell sites and continues to believe this is a significant step toward simplification.<sup>12</sup> Access to information about external cell sites, combined with knowledge about the identity of licensees in adjacent markets, should enable cellular licensees to address any interference concerns on the cellular frequencies.

While GTE concurs in the assessment that formal internal cell site notifications are not necessary, GTE believes that licensees should nonetheless maintain on their own complete records identifying all such internal cell sites and associated operating data, comparable to the information now submitted under the rules. This information should be provided upon reasonable request by other FCC radio service licensees. Cellular operations may cause interference to commercial mobile radio service (“CMRS”) operations in nearby frequency bands (for example, 800 MHz air-ground service). In order to determine the cause of the interference and resolve it, other licensees may need access to information about internal cell sites operating in particular systems.

GTE’s experience in obtaining information from cellular licensees to resolve interference problems has been mixed. Some licensees have been very cooperative in providing necessary cell site data and resolving any interference problems. Other licensees, however, have been reluctant to disclose cell site information and to take

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<sup>11</sup> Id. (citing Notice, 7 FCC Rcd at 3660-61, 3694-95).

<sup>12</sup> See GTE Comments, CC Docket No. 92-115 (filed Oct. 5, 1992).

other steps to address the interference. Accordingly, to ensure that licensees continue to make good faith efforts to resolve interference problems on their own and without resort to Commission processes, GTE suggests that the Commission require cellular licensees to maintain appropriate records on internal cell sites and to make information available upon reasonable request by other FCC licensees.

GTE also believes that the one time filing of external cell site information, by way of resubmitting Tables MOB 2 and MOB 3, would be extremely burdensome on licensees, particularly those with a large number of external cell sites. Instead, licensees should be required only to submit a map and the site location coordinates and FCC location number for the external cell sites. This alternative approach will provide the Commission and interested parties with the necessary information, combined with the filings already on record with the Commission, to review and identify a licensee's external cell sites.<sup>13</sup>

#### **IV. SYSTEM INFORMATION UPDATES**

The Further Notice proposes to modify the system information update ("SIU") filing requirements in several respects. The SIU maps should only be required to depict the external cell sites and their geographic coordinates, and the related service area boundaries that make up the system's CGSA boundary. This provides the information necessary for the Commission staff, adjacent licensees, and other interested parties to determine the parameters of a cellular system's operations.

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<sup>13</sup> In the event the Commission does adopt its one time filing proposal, it is essential that the filing periods be staggered as proposed in the Further Notice. Further Notice at ¶ 9. Because of the amount of work involved, at a time when licensees have continuing obligations to maintain and expand their systems, GTE recommends that filing dates involve a small number of markets in each round, separated by at least four weeks.

GTE does believe that the proposed new requirement to submit the Table MOB 3 information for each exterior cell site is unduly burdensome and unnecessary. This data already is on file with the Commission. Compilation of the Table MOB 3 information for resubmission with each SIU filing is a task that adds very little in the way of new information.

GTE strongly supports the proposed elimination of the required filing of a frequency plan with the SIU filing. In GTE's experience, those plans were not particularly useful and were often outdated within days of being filed with the Commission. Since the filing of the plans appears to serve no valid purpose, their elimination is clearly in the public interest.

Finally, GTE recommends that labelling requirements for SIU filings include not only the relevant market number, but also the frequency block. GTE has obtained copies of SIU filings that did not readily provide the necessary information relating to the market or the frequency block, making effective use of the filings difficult.

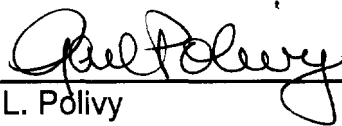
## **V. CONCLUSION**

For the reasons stated above, the Commission should take the following actions in this proceeding: (1) require licensees to provide information about the nature of SAB extensions into adjacent markets; (2) clarify the permissible use of non-USGS maps; (3) eliminate prior notifications for inner cell sites and delete the listing of such facilities on cellular licenses; (4) require licensees to maintain records on their cell sites and

make that information available upon reasonable request by other FCC licensees; and  
(5) modify its SIU filing requirements as outlined above. Such action is clearly in the public interest, and significantly streamlines the regulatory process for cellular licensees and FCC staff alike.

Respectfully submitted,

GTE Service Corporation, on behalf of GTE's  
affiliated domestic telephone, equipment and  
service companies

By 

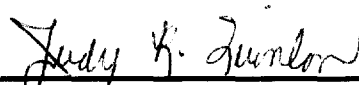
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June 20, 1994

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### **Certificate of Service**

I, Judy R. Quinlan, hereby certify that copies of the foregoing "Comments of GTE" have been mailed by first class United States mail, postage prepaid, on the 20th day of June to all parties of record on enclosed list.

  
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